

Subpart C: Prevention Program - Training

[§§ 68.54 & 68.71]



Training



- A training program,
 - Provides workers with the information they need to:
 - Understand how to operate safely, and
 - Why safe operations are necessary
 - Ensures that the rest of the prevention program is effective

Prevention Program (2)

Training Requirements § 68.54

- **Each employee**
 - Presently operating a process, and newly assigned to a covered process:
 - Have been trained or tested competent in the **operating procedures**
 - Employees operating a process on June 21, 1999; O/O certification
- **Refresher training.**
 - At least every three years
- **Training** conducted under:
 - Federal or state regulations
 - Industry specific standards or codes
 - Covered process equipment vendors
- **Trained** in any updated or new procedures
 - Prior to startup of a process after a major change

Does the Training impact other Prevention Program (2) Elements?

Training impacts on other Prevention Program (2) Elements

- § 68.56(b) & (c) Maintenance
 - (b) O/O: Train . . . each employee involved in maintaining the on-going mechanical integrity of the process.
 - Perform the job tasks in a safe manner
 - Trained in the hazards of the process,
 - How to avoid or correct unsafe conditions, and
 - In the procedures applicable to the employee's job tasks.
 - (c) Maintenance contractor shall ensure that:
 - Each contract maintenance employee is trained to perform the maintenance procedures

Prevention Program (3)

Training Requirements § 68.71

- (a) Initial Training
 - Presently **operating** a process, and newly assigned to a covered process:
 - (1) Have been trained or tested competent in the **operating** procedures
 - (2) Employees **operating** a process on June 21, 1999; O/O certification
- (b) Refresher Training
 - At least every three years
- (c) Training Documentation
 - O/O shall ascertain that each employee:
 - Received and understood the training,
 - O/O shall prepare a record which contains:
 - Employee ID,
 - Date of training, and
 - The means used to verify that the employee understood the training

Does the Training impact other Prevention Program (3) Elements?

Training impacts on other Prevention Program (3) Elements

- § 68.73 **Mechanical integrity**
 - (c) Training for process maintenance activities
- § 68.75 **Management of change**
 - (c) Employees . . . trained in, the change prior to start-up . . . process.
- § 68.77 **Pre-startup review**
 - (b)(4) Training of each employee involved in operating a process has been completed.
- § 68.87 **Contractors**
 - (c)(1) The contract O/O shall assure that each contract employee is trained . . . ,
 - (c)(3) Has received and understood the training,
 - Identity of the contract employee, the date of training, and the means used to verify that the employee understood is documented
- § 68.95 **Emergency response program**
 - (a)(3) Training for all employees in relevant procedures;